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Attorneys for Defendant  
International Fund Services (Ireland) Limited

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE PENSION COMMITTEE OF THE :  
UNIVERSITY OF MONTREAL PENSION PLAN, :  
et al., :  
Plaintiffs, : 05-CV-09016 (SAS)  
- against - : ECF Case

BANC OF AMERICA SECURITIES, LLC, CITCO :  
FUND SERVICES (CURACAO) N.V., THE CITCO :  
GROUP LIMITED, INTERNATIONAL FUND :  
SERVICES (IRELAND) LIMITED, :  
PRICEWATERHOUSECOOPERS (NETHERLAND : **NOTICE OF MOTION**  
ANTILLES), JOHN W. BENDALL, JR., RICHARD :  
GESIT, ANTHONY STOCKS, KIERAN CONROY :  
and DECLAN QUILLIGAN, :  
Defendants.

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PLEASE TAKE NOTICE that, upon the annexed complaint, the accompanying  
affidavit of Susan Byrne, and the exhibits attached thereto, the accompanying memorandum of  
law, and all prior proceedings had herein, defendant International Fund Services (Ireland)  
Limited ("IFSI") will move before the Honorable Shira A. Scheindlin, at the United States  
Courthouse, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Rules  
12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the complaint as

against IFSI for lack of personal jurisdiction over, and failure to state a claim for relief against, IFSI.

IFSI hereby certifies that the undersigned exchanged letters with plaintiffs' counsel in an effort to resolve the issues raised by this motion but were unable to reach any resolution or otherwise eliminate the need for this motion.

Dated: November 7, 2005

SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP

By: \s\ Seth M. Schwartz  
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